

Members of the Environment Committee:

I appreciate that you want to get tires out of the waste stream and recycled instead.

But I agree with Nancy Alderman of EHHI that the bill, HB 5139, needs to be improved in order to handle some obvious problems.

She notes, and I agree, that the Tire Stewardship Organization ought to include representatives of other nonprofits, especially environmental nonprofits, who can help steer the results in a truly environmentally harmless direction.

The proposed Tire Stewardship Organization as stipulated in Section One (7) Lines 22-26 of this Bill, states that the organization will be a nonprofit organization created by tire producers, and trade associations that represent producers of tires. **However, there is no mention of anyone other than tire people being part of the nonprofit. This is a dangerous oversight. There should be environmental nonprofits as part of this Stewardship Organization, as well as people with human health expertise.**

The second issue is what is going to happen to these tires when they are recycled? New products out of crumb rubber from tires are not necessarily any more benign than the original product.

1. Artificial turf from crumb rubber is not benign. See this article: [Fields of Waste: Artificial Turf, Touted as Recycling Fix for Millions of Scrap Tires, Becomes Mounting Disposal Mess - FairWarning](#)

2. Substances in rubber tires are poisonous to fish. See this article. Sorry if there is a pay wall. [How Scientists Tracked Down a Mass Killer \(of Salmon\) - The New York Times \(nytimes.com\)](#)

In Section One (11) lines 45-48 "Recycling" means any process in which discarded tires, components and by-products may lose their original identity or form as they are transformed into new, usable or marketable materials. **However, there is no requirement in this Bill that the resulting recycled tire products will prevent resulting products from interacting with children or prevent negative affects on human health or the environment or wildlife.**

This EPR Bill should be amended to include these changes.

Thank you for your consideration.

Karen Schnitzer

Inaction is the Ally of Extinction - Collin O'Mara, President & CEO of the National Wildlife Federation

